

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re REFCO INC. SECURITIES LITIGATION

07-MDL No. 1902 (JSR)

This document relates to:

08 Civ. 3065 (JSR)

KENNETH M. KRYS, et al.,

08 Civ. 3086 (JSR)

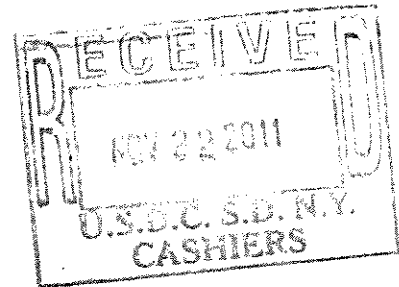
Plaintiffs,

**MOTION TO ADMIT  
KENNETH Y. TURNBULL  
PRO HAC VICE**

-v-

CHRISTOPHER SUGRUE, et al.,

Defendants.



**MOTION TO ADMIT KENNETH Y. TURNBULL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, James J. Capra, Jr., a member of good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

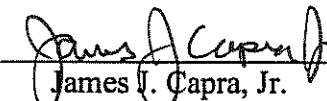
Kenneth Y. Turnbull  
King & Spalding LLP  
1700 Pennsylvania Avenue, NW  
Suite 200  
Washington, DC 20006-4707  
Tel: 202-737-0500  
Fax: 202-626-3737  
kturnbull@kslaw.com

Kenneth Y. Turnbull is a member in good standing of the Bars of the District of Columbia and the State of Maryland. There are no pending disciplinary proceedings against Kenneth Y. Turnbull in any State or Federal court.

Dated: New York, New York  
November 22, 2011

Respectfully submitted,

KING & SPALDING LLP

By:   
James J. Capra, Jr.  
1185 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 556-2100  
*Attorneys for Defendant*  
*PricewaterhouseCoopers LLP*

1. I am a partner at King & Spalding LLP, counsel for Defendant PricewaterhouseCoopers LLP (“PwC”) in the above captioned action. I am familiar with the proceedings of this case. I submit this affidavit based on my personal knowledge of the facts set forth herein and in support of Defendant’s motion to admit Kenneth Y. Turnbull as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York. I also am admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Kenneth Y. Turnbull since 2005.

4. Mr. Turnbull is a partner at King & Spalding LLP in Washington, DC.

5. I have found Mr. Turnbull to be a skilled attorney and a person of high moral character. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

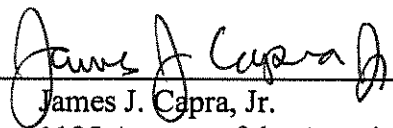
6. Accordingly, I am pleased to move the admission of Kenneth Y. Turnbull, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Kenneth Y. Turnbull, *pro hac vice*, which is attached hereto as Exhibit A.


WHEREFORE it is respectfully requested that the motion to admit Kenneth Y. Turnbull, *pro hac vice*, to represent Defendant in the above captioned matter, be granted.

Respectfully submitted,

KING & SPALDING LLP

By:   
James J. Capra, Jr.  
1185 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 556-2100  
*Attorneys for Defendants PwC and Mari Ferris*

Sworn to before me this  
22nd day of November, 2011

  
Notary Public  
JOHN C. McCULLOUGH  
Notary Public, State of New York  
No. 01-4905111  
Qualified in New York County  
Commission Expires Oct. 31, 2014  
11-30-2014

# EXHIBIT A

All attorneys appearing before this Court are subject to the Local Rules of this Court, including

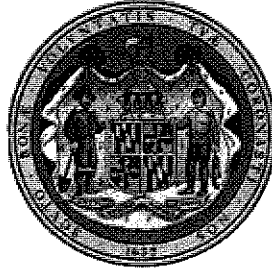
the Rules governing discipline of attorneys. Counsel shall apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2011  
New York, New York

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Special Master Hon. Ronald Hedges

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the sixteenth day of December, 1999,*

**Kenneth Yeatts Turnbull**

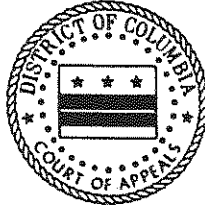
*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
twenty-first day of November, 2011.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*





District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

KENNETH YEATTS TURNBULL

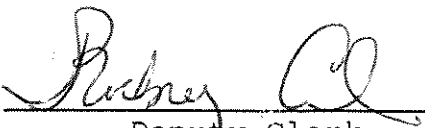
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was on the 2ND day of NOVEMBER, 2001

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on  
November 18, 2011.

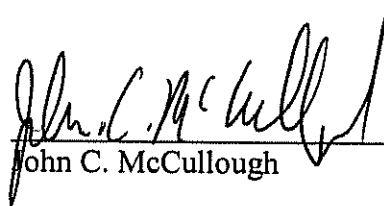
JULIO A. CASTILLO  
Clerk of the Court

By:   
Deputy Clerk

**CERTIFICATE OF SERVICE**

This is to certify, under penalty of perjury, that I have this date served true copies of the attached **MOTION TO ADMIT KENNETH Y. TURNBULL PRO HAC VICE** with Supporting upon counsel for all parties via electronic mail

This 22nd day of November, 2011.

  
\_\_\_\_\_  
John C. McCullough